1 Jeffrey H. Reeves (SBN 156648) Joshua A. Jessen (SBN 222831) 2 GIBSON, DUNN & CRUTCHER LLP 3161 Michelson Drive 3 Irvine, California 92612-4412 jreeves@gibsondunn.com 4 (949) 451-3800 (Telephone) IT IS SO ORDERED 5 (949) 451-4220 (Facsimile) 6 and 7 Judge James S. Ashlie Beringer (admitted *pro hac vice*) Laura M. Sturges (admitted *pro hac vice*) 8 GIBSON, DUNN & CRUTCHER LLP 9 1801 California Street, Suite 4200 Denver, Colorado 80202 10 aberinger@gibsondunn.com (303) 298-5718 (Telephone) 11 (303) 313-2868 (Facsimile) 12 Attorneys for Plaintiffs 13 [Defendants' and Counterclaimants' Counsel Listed On Signature Page] 14 UNITED STATES DISTRICT COURT 15 NORTHERN DISTRICT OF CALIFORNIA 16 SAN JOSE DIVISION 17 GRATEFUL DEAD PRODUCTIONS, a 18 CASE NO. 06-07727 (JW) (PVT) California corporation, CADESTANSA, LLC, a limited liability company on behalf of CARLOS 19 JOINT STIPULATION AND [PROPOSED] SANTANA, an individual, JIMMY PAGE, an ORDER TO EXTEND DEADLINE TO 20 individual, ROBERT PLANT, an individual, COMPLETE CERTAIN DISCOVERY AND JOHN PAUL JONES, an individual, 21 TO RESPOND TO COUNTERCLAIMS RAYMOND MANZAREK, an individual. ROBBY KRIEGER, an individual, JOHN 22 DENSMORE, an individual, PEARL 23 COURSON, an individual, GEORGE MORRISON, an individual, FANTALITY 24 CORP., a Colorado corporation, SONY BMG MUSIC ENTERTAINMENT, a Delaware 25 general partnership, BMG MUSIC, a New York partnership, and ARISTA RECORDS, a 26 Delaware LLC, 27 Plaintiffs, 28

1 v. 2 WILLIAM E. SAGAN, an individual, NORTON 3 LLC, a limited liability company, and BILL GRAHAM ARCHIVES LLC, d/b/a 4 WOLFGANG'S VAULT, a limited liability company, 5 Defendants. 6 7 NORTON LLC, a limited liability company, 8 BILL GRAHAM ARCHIVES LLC, d/b/a WOLFGANG'S VAULT, a limited liability 9 company, and WILLIAM E. SAGAN, an 10 individual, 11 Counterclaimants, 12 v. 13 GRATEFUL DEAD PRODUCTIONS, a California corporation, CADESTANSA LLC, a 14 limited liability company on behalf of CARLOS SANTANA, an individual, JIMMY PAGE, an 15 individual, ROBERT PLANT, an individual, 16 JOHN PAUL JONES, an individual, RAYMOND MANZAREK, an individual, 17 ROBBY KRIEGER, an individual, JOHN DENSMORE, an individual, PEARL 18 COURSON, an individual, GEORGE MORRISON, an individual, FANTALITY 19 CORP., a Colorado corporation, SONY BMG 20 MUSIC ENTERTAINMENT, a Delaware general partnership, BMG MUSIC, a New York 21 partnership, and ARISTA RECORDS, a Delaware LLC, ROBERT WEIR, an individual, 22 WARNER MUSIC GROUP CORP., a Delaware 23 corporation, RHINO ENTERTAINMENT, its subsidiary, and BRAVADO INTERNATIONAL 24 GROUP, INC., a California corporation, 25 Counterclaim Defendants. 26 27

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WHEREAS on or about November 20, 2007, all parties to this matter filed a Stipulation and Order to Stay Case Until April 1, 2008 to Allow Parties to Devote Time and Energy to Mediate Dispute (*Docket No.* 165);

WHEREAS on or about December 7, 2007, the Court made the parties' Stipulation the Order of the Court, as modified (*Docket No.* 174);

WHEREAS on or about April 1, 2008, all parties to this matter filed a Stipulation and Order to Continue Stay of Case until June 2, 2008 to Allow Parties to Devote Additional Time and Energy to Mediate Dispute (*Docket No.* 175);

WHEREAS on or about April 9, 2008, the Court made the parties' Stipulation the Order of the Court, as modified (*Docket No.* 176);

WHEREAS the parties have not yet settled the action, but continue to work towards a settlement;

WHEREAS, among other things, the April 9, 2008 Stipulation and Order (*Docket No.* 176) includes the following to occur by June 23, 2008:

- Plaintiffs and Counter-Defendants to answer or otherwise respond to Defendants' First Amended Counterclaims;
- Plaintiffs to produce and/or serve all documents that they have previously agreed to
 produce in response to Defendants' Second, Third and Fourth sets of Requests for
 Production, and to produce written responses to Defendants' Fourth Set of Requests
 for Production;
- 3. Defendants to produce and/or serve all documents, things, letters, and written discovery responses required by Judge Trumbull's November 2, 2007 Order, with the exception of all audio and audiovisual recordings (which are the subject of this Court's June 6, 2008 Order (*Docket No.* 180), extending the deadline for production of the recordings to July 23, 2008);

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4. Parties to serve any other currently outstanding discovery items for which a deadline is 1 2 imposed by the Federal Rules of Civil Procedure (e.g., changes to deposition 3 transcripts); 4 WHEREAS due to the ongoing settlement efforts and the volume of the required actions to 5 take place by June 23, 2008, the parties have agreed to extend this deadline from June 23, 2008 until 6 July 23, 2008; 7 WHEREAS the April 9, 2008 Stipulation and Order (Docket No. 176) also stated that parties 8 shall hold a two hour in person meet and confer regarding Plaintiffs' production of documents and 9 other discovery no later than June 23, 2008, which parties intend to complete as scheduled in order to 10 move this action forward should a settlement not conclude; 11 WHEREAS it is HEREBY STIPULATED AND AGREED, by the parties through their 12 respective counsel, and subject to the approval of this Court, that the deadline for all parties to 13 complete the tasks set forth in enumerated items 1 to 4 above shall be extended from June 23, 2008, 14 until and including July 23, 2008. 15 Pursuant to Local Rule 6-2(a), other time modifications that have been entered in this case are 16 set forth in the supporting Declaration of Laura M. Sturges, filed concurrently herewith. 17 Respectfully submitted, 18 DATED: June 10, 2008 GIBSON, DUNN & CRUTCHER LLP 19 By s/ Jeffrey R. Reeves 20 Jeffrey H. Reeves, SBN 156648 Joshua A. Jessen, SBN 222831 21 3161 Michelson Drive Irvine, California 92612-4412 22 Tel: 714-451-3800 23 and 24 S. Ashlie Beringer Laura M. Sturges 25 1801 California Street, Suite 4200 Denver, CO 80202 26 Telephone: 303-298-5718 27 Attorneys for Plaintiffs 28

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2	DATED: June 10, 2008	WINS	WINSTON & STRAWN LLP	
3		By	s/ Thomas P. Lane Michael S. Elkin (admitted <i>pro hac vice</i>)	
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6 7			Rebecca Lawlor Calkins, SBN 195593 Erin R. Ranahan, SBN 235286 333 South Grand Ave, 38 th Floor Los Angeles, CA 90071	
8			Tel: 213-615-1700	
9			and	
10			Andrew P. Bridges, SBN 122761 Jennifer A. Golinveaux, SBN 203056	
11			101 California Street San Francisco, CA 94111	
12			Tel: 415-591-1506	
13	Attorneys for Defendants			
14	In accordance with Civil L.R. 5-4 and General Order No. 45(X)(B), I, Laura M. Sturges, attest			
15	under penalty of perjury under the laws of the United States of America that I have the concurrence			
16	of the other signatories to this document.			
17			s/ Laura M. Sturges	
18			Laura M. Sturges	
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ORDER

Pursuant to the Stipulation above, it is hereby ordered that:

- The deadline for Plaintiffs and Counter-Defendants to answer or otherwise respond to Defendants' First Amended Counterclaims shall be extended from June 23, 2008, until and including July 23, 2008;
- 2. The deadline for Plaintiffs to produce and/or serve all documents that they have previously agreed to produce in response to Defendants' Second, Third and Fourth sets of Requests for Production, and to produce written responses to Defendants' Fourth Set of Requests for Production shall be extended from June 23, 2008, until and including July 23, 2008;
- 3. The deadline for Defendants to produce and/or serve all documents, things, letters, and written discovery responses required by Judge Trumbull's November 2, 2007 Order shall be extended from June 23, 2008, until and including July 23, 2008;
- 4. The deadline for all parties to serve any other currently outstanding discovery items for which a deadline is imposed by the Federal Rules of Civil Procedure (*e.g.*, changes to deposition transcripts) shall be extended from June 23, 2008, until and including July 23, 2008;

Dated: June 23, 2008

Honorable James Ware U.S. District Judge